

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

In re:	)	
	)	Chapter 11
PARTY CITY HOLDCO, INC., <i>et al.</i> , <sup>1</sup>	)	
	)	Case No. 24-90621 (ARP)
	)	(Jointly Administered)
Debtors.	)	
	)	
	)	
	)	Ref. D.I. 44, 380

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**OBJECTION AND JOINDER TO LIMITED OBJECTION OF CERTAIN LANDLORDS  
TO DEBTORS' EMERGENCY MOTION FOR ENTRY OF INTERIM AND FINAL  
ORDERS (I) AUTHORIZING THE DEBTORS TO (A) USE CASH COLLATERAL AND  
(B) GRANT LIENS AND PROVIDE SUPERPRIORITY ADMINISTRATIVE EXPENSE  
CLAIMS, (II) GRANTING ADEQUATE PROTECTION TO CERTAIN PREPETITION  
SECURED PARTIES, (III) MODIFYING THE AUTOMATIC STAY, (IV)  
SCHEDULING A FINAL HEARING, AND (V) GRANTING RELATED RELIEF**

CBL & Associates Management, Inc., as managing agent to the CBL Landlords<sup>2</sup>, by and through counsel, hereby joins in, and incorporates by reference herein as if it were its own the objections and arguments asserted in the *Limited Objection of Certain Landlords to Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Use Cash Collateral, and (B) Grant Liens and Provide Superpriority Administrative Expense Claims, and (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* [Docket No. 380] for the reasons stated therein.

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<sup>1</sup> The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: Party City Holdco Inc. (9758); Amscan Inc. (1359); Am-Source, LLC (8427); Party City Corporation (3692); Party City Holdings Inc. (3029); PC Intermediate Holdings, Inc. (1229); and Trisar, Inc. (0659). The location of the Debtors' service address for purposes of these chapter 11 cases is: 100 Tice Boulevard, Woodcliff Lake, New Jersey 07677.

<sup>2</sup> CBL & Associates Management, Inc. is managing agent to the landlords (collectively, the "CBL Landlords") from whom Debtor leased real property prior to the Petition Date on **Schedule A**.

Dated this 31st day of January 2025.

Respectfully Submitted:

**HUSCH BLACKWELL LLP**

By: /s/ Buffey E. Klein  
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*Attorneys for CBL &  
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**CERTIFICATE OF SERVICE**

I, Buffey E. Klein, hereby certify that on this 31<sup>st</sup> day January 2025, I cause the foregoing *Objection and Joinder to Limited Objection of Certain Landlords to Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Use Cash Collateral, and (B) Grant Liens and Provide Superpriority Administrative Expense Claims, and (II) Granting Adequate Protection to Certain Prepetition Secured Parties, (III) Modifying the Automatic Stay, and (IV) Scheduling a Final Hearing, and (V) Granting Related Relief* to be served via this Court's ECF notification service upon all parties registered to receive notice.

/s/ Buffey E. Klein  
Buffey E. Klein

**Schedule A**

<b><u>Landlord</u></b>	<b><u>Property</u></b>	<b><u>Location</u></b>
Dakota Square Mall CMBS, LLC	Dakota Square Mall	Minot, ND
CBL/Monroeville Partner, L.P.	Monroeville Mall	Monroeville, PA
Terrace CMBS, LLC	The Terrace	Chattanooga, TN